

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

DIANE D. JONES, individually and on )  
behalf of herself and all others similarly ) Civ. No. 3:19-cv-02087-B  
situated, )  
)  
*Plaintiff*, )  
)  
v. )  
)  
REALPAGE, INC. d/b/a LEASINGDESK )  
SCREENING, )  
)  
*Defendant*. )

**[PROPOSED] ORDER COMPELLING INTERROGATORY  
RESPONSE AND DOCUMENT PRODUCTION AND IMPOSING SANCTIONS**

AND NOW, upon consideration of Plaintiff's Motion to Compel and for Sanctions, and  
good cause appearing therefore,

IT IS, this \_\_\_\_\_ day of \_\_\_\_\_, 2020, HEREBY ORDERED that  
Plaintiff's Motion to Compel and for Sanctions is GRANTED. Defendant is HEREBY  
ORDERED to produce the following information no later than \_\_\_\_\_, 2020:

- (1) A correct response to Plaintiff's Interrogatory 15;
- (2) All extracted reports and data used to derive the response to Plaintiff's Interrogatory  
15, which is responsive to Plaintiff's Document Request 2;
- (3) A knowledgeable witness for deposition regarding the process used to derive the  
corrected response to Plaintiff's Interrogatory 15.

It is further ORDERED that Plaintiff's request for sanctions is GRANTED. Within ten (10) days  
after the completion of the deposition referenced above, Plaintiff will submit to the Court a revised

declaration identifying the attorney time and expenses incurred in connection with each of the categories identified in paragraph 11 of the February 21, 2020 Declaration of John Soumilas.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Jane J. Boyle  
United States District Judge